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FILED.

DATED: 4:29 pm, April 29, 2022

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CLARENCE MEEKINS,

Defendant.

Case No. 2:22-mj-00343-DJA

COMPLAINT

VIOLATIONS:

18 U.S.C. § 922(o) – Possession of a
Machinegun

18 U.S.C. §§ 922(a)(1)(A), 923(a) and
924(a)(1)(D) – Engaging in the Business
of Dealing and Manufacturing Firearms
Without a License

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being duly sworn, deposes and states:

COUNT ONE

Illegal Possession of a Machine Gun
(18 U.S.C. §§ 922(o))

On or about March 23, 2022, in the State and Federal District of Nevada,

CLARENCE MEEKINS,

defendant herein, did knowingly possess a machinegun, to wit: a machine gun conversion
device with no manufacturer's marks or serial number, used to modify a Glock semi-
automatic firearm to fire as a fully automatic weapon, enabling said firearm to automatically

shoot more than one shot, without manual reloading, by a single function of the trigger, all in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TWO

Engaging in the Business of Dealing or Manufacturing Firearms Without a License
(18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

From on or about March 22, 2022, and continuing to or about April 28, 2022, in the State and Federal District of Nevada,

CLARENCE MEEKINS,

defendant herein, not being a licensed dealer and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in and manufacturing firearms that is, the defendant manufactured and sold privately made firearms and machine gun conversion devices, all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

PROBABLE CAUSE AFFIDAVIT

Your Complainant, as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), states the following as and for probable cause:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), a component of the United States Department of Justice, and have been so employed since May 2016. I am currently assigned to the ATF Las Vegas Group II Crime Gun Intelligence Task Force. As an ATF Special Agent, I have successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and Special Agent Basic Training at the ATF National Academy. The training that I received at the academy included formalized instruction in, among other things: firearms, drugs, and violent crime-related investigations, familiarization with United States firearms laws, financial investigations and money laundering, identification

1 and seizure of drug and firearms tracking related assets, physical and electronic
2 surveillance, weapon qualification and tactics, operation and use of confidential sources,
3 and undercover operations.

4 2. As an ATF Special Agent, I have conducted and participated in both state
5 and Federal investigations involving the illegal possession and trafficking of firearms. I
6 have investigated and assisted in the prosecution of criminal street gangs engaged in illegal
7 narcotics and firearms trafficking. During these investigations, I have participated in
8 and/or served as the primary case agent in cases involving various types of investigative
9 techniques, including the use of electronic surveillance, assistance from undercover agents
10 and informants, and the controlled purchases of firearms and narcotics from suspects. I
11 have also participated in physical surveillance operations and the execution of state and
12 federal arrest warrants and search warrants, resulting in state and federal prosecution of
13 defendants. In addition to utilizing the aforementioned investigative techniques, I have
14 been required during these investigations to analyze information resulting from traditional
15 record searches, pen registers and trap and trace devices, financial records, utility records,
16 and telephone toll and subscriber records. My work with informants and cooperators has
17 involved, among other things, monitoring meetings and recorded conversations, and
18 generally evaluating the reliability and truthfulness of an informant/cooperator. Because
19 of my training and experience, I have become familiar with the manner in which illegal
20 firearm and drug traffickers smuggle, transport, store, conceal, and distribute firearms and
21 drugs, as well as how they collect and launder proceeds related to such activities. I am also
22 familiar with the manner in which these individuals use telephones, coded
23 communications, false or fictitious identities, and other means to facilitate illegal activities
24 and thwart law enforcement investigations. I have also consulted and discussed these

1 investigations with other law enforcement officers and agents who are experienced in
2 these types of investigations.

3 3. I have been involved in an investigation, which is the subject of this
4 Affidavit. Due to my personal participation in this investigation and reports made by other
5 ATF Agents, Las Vegas Metropolitan Police Department (LVMPD) Detectives, and other
6 Law Enforcement Officers, I am familiar with the facts and circumstances surrounding the
7 investigation. My training and experience as a Special Agent, including participation in
8 this investigation, form the basis for opinions and conclusions set forth below.

9 4. The following factual statement is a brief summary of the information that I
10 have gained from my personal involvement in the investigation and from various
11 intelligence sources currently available with respect to this investigation. Unless otherwise
12 noted, if I assert that a statement was made, the information was provided by an ATF
13 Special Agent, LVMPD Detective, or another law enforcement officers (who may have
14 had either direct or hearsay knowledge of the statement) to whom I have spoken to or
15 whose reports I have reviewed. This affidavit is being submitted for the limited purpose of
16 seeking authorization for a criminal complaint. Therefore, I have not set forth each and
17 every fact learned during the course of this investigation. However, facts not set forth
18 herein are not being relied upon in reaching my conclusion that the requested criminal
19 complaint should be issued based on the probable cause contained herein. All times
20 contained herein are approximate. I have set forth only the facts that I believe are
21 necessary to establish probable cause.

22 **FACTS ESTABLISHING PROBABLE CAUSE**

23 5. On or about March 22, 2022, agents and officers assigned to the
24 LVMPD/ATF Crime Gun Intelligence Center (CGIC) Task Force were informed by an

ATF Confidential Informant¹ (hereinafter “CI-1”) that he/she met an individual who went by the name “G” that was engaging in the manufacturing of privately made firearms (“PMFs”) and machinegun² conversion devices (“MCDs”) utilizing additive manufacturing, commonly identified as: “3-D Printing.” One type of a MCD is commonly referred to as a “Glock Switch,” also known as a Glock conversion device. A Glock switch is a machinegun under the National Firearms Act (NFA), 26 U.S.C. § 5845(b). Glock conversion devices can be attached to a Glock, semi-automatic pistol, converting the semi-automatic firearm into a fully automatic machinegun. The individual, “G,” manufacturing and trafficking firearms and firearms related parts was later identified as the defendant, CLARENCE MEEKINS.

6. CI-1 was introduced to MEEKINS through an unidentified male on or about March 22, 2022. The unidentified male advised CI-1 that MEEKINS was from New York and was selling firearms and MCDs that MEEKINS built at home, utilizing a 3-D printer. On this same date, CI-1 was introduced and invited to MEEKINS’ residence. MEEKINS provided the CI-1 with an address of: 7967 NARNIA AVENUE, LAS VEGAS, NEVADA, 89113 (hereinafter the “Residence”). The conversation below depicts the communications between CI-1 and +1-XXX-XXX-8404 (hereinafter “TT-1”).

¹ ATF Las Vegas has been utilizing a confidential informant (“CI”) beginning in February 2021. The CI has been working for ATF for approximately over 3 years. CI’s information has proven reliable in the past on several investigations. All information provided by CI is corroborated by law enforcement investigators. CI has a signed cooperation agreement and pled guilty to one count of Conspiracy to Make a False Statement in Acquisition of a Firearm and one count of Conspiracy to Distribute a Controlled Substance. CI is working for consideration of CI’s charges.

² The NFA, 26 U.S.C. § 5845(b) defines the term “**machinegun**” as: “...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.”

- TO TT-1: Where to go
- FROM TT-1: 7967 Narnia Ave
- TO TT-1: On my way

7. While visiting MEEKINS at the Residence on the evening of March 22, 2022, CI-1 captured the following five images that depict what appears to be the frame portion of a firearm manufactured by a 3-D printer. The five images are included below:





1 8. In addition, the CI-1 captured two images depicting what appear to be a
2 machinegun conversion device manufactured by a 3-D printer while visiting MEEKINS at
3 the Residence that same evening. The two images are included below:



20 9. On or about March 22, 2022, ATF agents conducted National Crime
21 Information Center ("NCIC") queries of MEEKINS' criminal history and located the
22 following felony convictions in New York:

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24 ///

1 a. Criminal Possession Controlled Substance-5th: Intent to Sell; Date of
2 Conviction: 02/22/2006; Court: Nassau County, NY Court; Case Number: 00406N-2006

3 b. Criminal Possession Controlled Substance-3rd: Narcotic Drug Intent
4 to Sell; Date of Conviction: 01/18/2007; Court: Nassau County, NY Court; Case Number:
5 00106N-2007

6 c. Hobbs Act Robbery and Brandishing a Firearm During a Crime of
7 Violence; Date of Conviction: 06/18/2015; Court: Eastern District of New York; Case
8 Number: 2:12-cr-00164-LDW-GRB

9 10. Between March 22, 2022 and March 23, 2022, MEEKINS and CI-1
10 continued to exchange text messages regarding a future firearm transaction with TT-1.

11 11. On or about March 23, 2022, ATF agents reviewed a New York
12 Department of Motor Vehicles (DMV) photograph of MEEKINS that was captured on or
13 about November 13, 2015. ATF agents subsequently presented the aforementioned
14 photograph to the CI who confirmed that the male in the photo (MEEKINS) was the male
15 that CI-1 knew as "G."

16 12. On or about March 23, 2022, the ATF and the LVMPD conducted a
17 controlled purchase operation of a MCD by CI-1 from MEEKINS. Prior to the
18 transaction through text messages with TT-1, MEEKINS and CI-1 coordinated a time to
19 meet at the Residence. Prior to the transaction and CI-1's arrival, MEEKINS was
20 observed by surveillance units pacing back and forth, and up and down the street on
21 Narnia Avenue throughout various times. Upon CI-1's arrival, MEEKINS was waiting at
22 the corner entrance of the neighborhood and was waiting for CI-1 to turn into the
23 neighborhood. During the transaction which occurred in the driveway of the Residence,
24 MEEKINS entered CI-1's vehicle, and informed CI-1 that the MCD was still being

1 worked on, and that CI-1 would need to return later in the day for pick-up. MEEKINS
2 exited CI-1's vehicle, and proceeded into the Residence, and returned to CI-1's vehicle
3 with what appeared to be a privately made firearm (PMF) that CI-1 had seen the night
4 prior, with parts added to it. MEEKINS explained and showed CI-1 the PMF, and
5 informed CI-1 that the remaining parts would be in by the next Wednesday. CI-1 provided
6 MEEKINS with \$500 of documented ATF funds to pay for the MCD that would be
7 picked up later in the day. The same \$500 also served as a way for CI-1 to provide a
8 deposit for parts to be used on future PMF purchases. Shortly after, CI-1 departed the
9 Residence. Approximately one hour after waiting at a pre-determined location with agents
10 and detectives, CI-1 returned to the Residence to retrieve the MCD. Upon return to the
11 Residence, CI-1 pulled his/her vehicle into the driveway, and MEEKINS was located in
12 the garage. MEEKINS entered the passenger seat of CI-1's vehicle and began to
13 demonstrate how the MCD functions. MEEKINS informed CI-1 to be careful with the
14 switch because it's "Federal." MEEKINS proceeded to exit the vehicle, and CI-1 departed
15 the Residence to meet at a predetermined meet location and provided agents with the
16 MCD purchased from MEEKINS.

17 13. On or about March 25, 2022, the aforementioned purchased MCD was sent
18 to the Firearms Technology Criminal Branch and a "Report of Technical Examination"
19 was provided to me. The MCD was identified as the following: Glock-Type 3-D printed
20 back plate device, white in color. The examination found that the MCD purchased from
21 MEEKINS was designed to, and through demonstration, successfully converted the
22 semiautomatic Glock Pistol into a machinegun.

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24 ///

1 14. On or about March 29, 2022, the ATF and the LVMPD conducted another
2 controlled purchase operation involving CI-1 and the purchase of one PMF from
3 MEEKINS for \$200, in addition to the \$500 previously provided by CI-1 to MEEKINS on
4 March 23, 2022. Prior to the transaction and through text messages with TT-1, MEEKINS
5 and CI-1 communicated on or about the dates of March 27, 2022 through March 29, 2022,
6 to coordinate the purchase of the PMF. After departing a pre-determined meet location on
7 March 29, 2022, CI-1 proceeded to MEEKIN's Residence. CI-1 texted MEEKINS at TT-1
8 upon arrival at the Residence. CI-1 then proceeded to call MEEKINS at TT-1 to advise
9 that CI-1 had arrived. MEEKINS opened the garage door, and then entered CI-1's vehicle
10 in the front passenger seat carrying a red/pink colored box. Upon entry into CI-1's
11 vehicle, MEEKINS opened the red/pink colored box and handed the firearm to CI-1.
12 CI-1 examined the firearm and provided MEEKINS with the remaining \$200 of ATF
13 documented funds for the firearm. MEEKINS asked CI-1 if CI-1 needed bullets for the
14 PMF, to which CI-1 agreed. MEEKINS exited CI-1's vehicle, entered the Residence
15 through the garage door, grabbed three (3) rounds of Belom 9x19 ammunition, and
16 returned to CI-1's vehicle. MEEKINS wiped the rounds of ammunition and placed them
17 into the magazine of the PMF. CI-1 informed MEEKINS that he would be taking the
18 PMF to an associate's house. The firearm did not depict any visible markings of
19 manufacturer, model, or caliber, which is typical of a PMF. MEEKINS exited CI-1's
20 vehicle, and CI-1 departed the Residence to meet at a predetermined meet location and
21 provided agents with the firearm and ammunition purchased from MEEKINS.

22 15. On or about April 6, 2022, the aforementioned purchased PMF was sent to
23 the Firearms Technology Criminal Branch and a "Report of Technical Examination" was
24 provided to me. The PMF was identified as the following: Glock-Type, 3-D printed

1 privately made firearm (PMF), 9mm Luger caliber firearm, no serial number, with
2 included magazine. The examination found that the PMF purchased from MEEKINS was
3 a “firearm” by definition, meaning it will expel a projectile by the action of an explosive
4 and incorporating the frame of such a weapon.

5 16. On or about March 31, 2022, the ATF and the LVMPD conducted another
6 controlled purchase operation involving the use of CI-1 and an undercover agent (UC) and
7 the acquisition of two MCD’s from MEEKINS as well as to provide MEEKINS \$1,300 in
8 funds for parts and labor to be used on future PMF purchases. Upon arrival at MEEKINS’
9 Residence, CI-1 pulled into the driveway and MEEKINS’ garage door was observed to be
10 open. MEEKINS was sitting in the driver’s seat of a silver SUV with the vehicle door
11 open and proceeded to approach CI-1’s vehicle and enter the rear driver side seat. CI-1
12 remained in the driver’s seat of CI-1’s vehicle, and the UC remained in the front
13 passenger’s seat of CI-1’s vehicle. MEEKINS provided CI-1 with two complete MCDs
14 that he created through 3-D printing. The UC began speaking with MEEKINS regarding
15 firearm frames he had been manufacturing in the same manner. The UC asked if
16 MEEKINS could show the UC the frames. MEEKINS departed CI-1’s vehicle and
17 entered the Residence through the interior garage door. A few moments later, MEEKINS
18 exited the same interior garage door with five 3-D printed Glock-style firearm frames and
19 re-entered CI-1’s vehicle from the rear driver’s side. When asked how long it would take to
20 complete assembly, MEEKINS claimed he could order the remaining parts and finish the
21 firearms in one week. The UC proceeded to provide MEEKINS with one thousand, three
22 hundred dollars (\$1,300.00) of documented ATF funds for parts and labor for three pistols
23 in which the UC selected the frames from those presented by MEEKINS. MEEKINS
24 consented to CI-1 providing the UC with his number. The UC then sent a message to

1 MEEKINS at phone number XXX-XXX-8404 (TT-1). CI-1 and the UC departed the
2 Residence to meet at a predetermined meet location.

3 17. On or about April 6, 2022, the aforementioned purchased MCD's were sent
4 to the Firearms Technology Criminal Branch and a "Report of Technical Examination" was
5 provided to me. The MCD's were both identified as the following: Glock-Type, 3-D printed
6 back plate device, white in color. The examination found that the MCDs purchased from
7 MEEKINS were both a "machinegun" by definition, meaning they are both designed to and
8 through demonstration successfully converted the semiautomatic NFC Glock pistol into a
9 machinegun.

10 18. On or about April 1, 2022, MEEKINS contacted the UC from the following
11 facility: 702-XXX-1287 (hereinafter, "TT-2") stating that the aforementioned was
12 MEEKINS' new number. Over the next days, MEEKINS texted and called the UC from
13 TT-2 to coordinate firearms pick-up.

14 19. On or about April 5, 2022, the ATF and the LVMPD conducted another
15 controlled purchase operation involving the use of the same undercover agent and the
16 purchase of two PMFs from MEEKINS, as well as to provide MEEKINS funds for parts
17 and labor to be used on future PMF purchases for a total of \$1,500. Upon arrival at
18 MEEKINS' Residence the UC parked in the driveway and notified MEEKINS at TT-2 that
19 the UC had arrived. Shortly after, the exterior garage door of the Residence opened, and
20 MEEKINS exited the interior garage door from the main residence carrying a small United
21 States Postal Service (USPS) shipping box and wearing black and red gloves. MEEKINS
22 entered the front passenger seat of the UC vehicle and provided the UC with two completed
23 9mm caliber PMF pistols using 3-D printed frames and Glock-style components.

24 MEEKINS function tested each firearm before handing it to the UC. MEEKINS showed

1 the UC several other completed frames that he had printed from the USPS box. MEEKINS
2 showed the UC a webpage on his phone with prices for component kits that he orders to
3 complete the assembly and make functioning firearms. The UC provided MEEKINS with a
4 total of one thousand, five hundred (\$1,500.00) of documented ATF funds for the two
5 completed PMFs and two incomplete pistols. MEEKINS exited the UC vehicle and entered
6 the Residence through the interior garage door, and the UC departed to a predetermined
7 meet location.

8 20. On or about April 6, 2022, the aforementioned purchased PMFs were sent
9 to the Firearms Technology Criminal Branch and a "Report of Technical Examination"
10 was provided to me. The PMFs were both identified as the following: Glock-Type, 3-D
11 printed privately made firearm (PMF), 9mm Luger caliber firearm, no serial number, with
12 included magazine. The examination found that the PMFs purchased from MEEKINS
13 were both a "firearm" by definition, meaning they will expel a projectile by the action of
14 an explosive and incorporating the frame of such a weapon.

15 21. On or about April 11, 2022, the ATF and LVMPD conducted another
16 controlled purchase operation involving the use of the same UC and the purchase of one
17 PMF from MEEKINS for \$500 including for parts and labor. The UC communicated with
18 MEEKINS on TT-2 on or about the dates between April 7, 2022, and April 11, 2022,
19 coordinating the purchase and status of other PMFs that MEEKINS had for sale. On or
20 about April 11, 2022, the UC drove to MEEKINS' Residence. Upon arrival, MEEKINS
21 gestured for the UC to come inside, and greeted the UC in the garage with a box full of
22 3-D printed pistol frames. MEEKINS then walked toward the interior entry door and
23 closed the garage door behind them. While walking inside of the Residence, the UC
24 located an unidentified black female adult, and two young juveniles. MEEKINS

1 introduced one of the children as his son. MEEKINS led the UC upstairs in the Residence
2 to a second-floor room which contained his 3-D printers and firearms
3 accessories/components. MEEKINS explained the functionalities of the printers and how
4 they worked. One of the machines was actively manufacturing an AR-style lower receiver.
5 MEEKINS explained that he sends some of the parts to a different address. MEEKINS
6 further displayed several pistol frames he had completed printing, as well as a slide with a
7 MCD attached. MEEKINS informed the UC that he was owed five hundred dollars
8 (\$500.00) for the parts he ordered for the firearms and labor, which the UC provided in
9 previously recorded and documented ATF funds. MEEKINS utilized a desktop computer
10 to show the UC the online pages and communities he was involved in related to firearms
11 parts and accessories. MEEKINS agreed to contact the UC upon completed assembly of
12 the firearm later in the day.

13 22. During a second meeting with MEEKINS later in the afternoon on or about
14 April 11, 2022, MEEKINS and the UC agreed to meet in the parking lot near the Eastern
15 Beltway Shopping Center in Las Vegas, Nevada. MEEKINS arrived in a silver Honda Pilot
16 bearing New York license plate: JHT2470 riding in the front passenger seat. The
17 unidentified female from MEEKINS' Residence was driving, and both children were in the
18 rear seats. MEEKINS exited the Honda pilot and entered the front passenger seat of the UC
19 vehicle while carrying a USPS box. MEEKINS withdrew a black pistol comprised of the
20 same frame and slide assembly that MEEKINS had shown the UC at MEEKINS'
21 Residence. MEEKINS demonstrated the functionality of the firearm, explaining he had
22 some technical issues with the MCD, so he left it off. The UC inquired about the AR-
23 variant lower receiver that MEEKINS had been printing, and MEEKINS agreed to sell the
24 completed firearm to the UC after he did more research on completing the assembly. The

1 UC provided MEEKINS with one thousand dollars (\$1,000.00) of previously documented
2 ATF funds for the assembled pistol PMFs and for the parts and labor to be used on the
3 completion of an AR-style variant. MEEKINS exited the UC vehicle and returned to the
4 Honda pilot.

5 23. On or about April 23, 2022, MEEKINS contacted the UC from TT-2 stating
6 “complete.” MEEKINS and the UC discussed pricing, and MEEKINS disclosed that they
7 would be “square at 8.” Based on my training and experience, the aforementioned reference
8 likely refers to \$800.

9 24. On or about April 27, 2022, the UC contacted MEEKINS at TT-2 to confirm
10 availability for pick-up the following day (April 28, 2022), to which MEEKINS disclosed
11 that he would be ready.

12 25. On or about April 28, 2022, MEEKINS responded from TT-2 informing the
13 UC that he was ready and also wanted to discuss some “moves” with the UC. Based on my
14 training and experience, the aforementioned reference likely refers to a business proposition
15 involving additional firearms. The UC and MEEKINS agreed to meet at the Home Depot
16 parking lot near the Eastern Beltway Shopping Center, which was the same location used
17 for the deal that occurred on or about April 11, 2022.

18 26. On or about April 28, 2022, ATF and LVMPD investigators initiated
19 surveillance on MEEKINS’ Residence. The Honda pilot was observed leaving the
20 Residence and was followed by surveillance units. An LVMPD marked patrol unit initiated
21 a vehicle stop on the Honda pilot on the 215 Freeway (Bruce Woodbury Beltway) at or near
22 South Rainbow Blvd. A vehicle stop was conducted with Kimberly Meekins as the driver,
23 MEEKINS as the passenger in the front seat, two juveniles in the back seat. MEEKINS was
24

1 placed in handcuffs and detained. All other occupants were detained during the execution of
2 the search warrant for the Honda pilot.

3 27. On or about April 28, 2022, investigators conducted a search of the Honda
4 pilot, pursuant to a Federal Search Warrant (Case No. 2:22-mj-00317-DJA), which was
5 authorized by Magistrate Judge Daniel J. Albregts in the District of Nevada on or about
6 April 26, 2022. During the search of the vehicle, multiple items of evidence were seized
7 that are associated with manufacturing of firearms, to include, but not limited to, the
8 following:

- 9 a. One privately manufactured firearm (PMF) rifle bearing no serial
10 number; and
11 b. One PMF Pistol bearing no serial number

12 28. Following the search of the vehicle, investigators conducted a custodial,
13 recorded interview with MEEKINS at the Las Vegas ATF Field Office, located at 8965 S.
14 Eastern Ave. Suite 200 Las Vegas, Nevada, 89123. During this time, investigators
15 administered *Miranda* warnings to MEEKINS, and MEEKINS voluntarily waived his
16 rights and spoke with investigators. In response to questioning, MEEKINS stated that he
17 utilized a website called “Thingiverse” in order to download “STL” files related to
18 firearms printing and MCDs, and used Ebay to purchase additional firearms parts.
19 MEEKINS disclosed that there was a revolver, and a rifle located at his residence in the
20 bedroom. MEEKINS indicated that that he drove from New York when moving to Las
21 Vegas with the aforementioned firearms in June 2021. MEEKINS admitted to knowing
22 that he “100 percent” should not possess firearms.

23 29. Continuing on the same date, investigators conducted a search of
24 MEEKINS’ Residence, 7967 Narnia Avenue, Las Vegas, NV, pursuant to a Federal

1 Search Warrant (Case No. 2:22-mj-00315-DJA) which was authorized by Magistrate
 2 Judge Daniel J. Albregts in the District of Nevada on or about April 26, 2022. During the
 3 search of the residence, multiple items of evidence were seized that are associated with
 4 manufacturing of firearms, to include, but not limited to, the following:

- 5 a. One Rossi SS Poly, 410 Gauge Shotgun, bearing serial number
 6 7CS0878F6N
- 7 b. One Smith & Wesson, Model 642-2, .38 Special, revolver bearing
 8 serial number CSL1279
- 9 c. Three additive manufacturing (3-D) "Creality" printers bearing the
 10 following serial numbers: P202K01L19379, P202K01L0800, and
 11 P202J12L39958
- 12 d. Three Devices which appear to be Machinegun Conversion Devices
 13 (One MCD was fully assembled, One MCD contained the backplate
 14 only, and one MCD contained an extended polymer leg and
 15 backplate that was not fully assembled) similar to those previously
 16 purchased by the UC on March 31, 2022.
- 17 e. One 3-D printed AR-Variant frame
- 18 f. Thirteen 3-D printed pistol frames
- 19 g. Various magazines and ammunition

20 30. At the time of investigators' entry into the subject residence, investigators
 21 noticed what appeared to be two 3-D printers actively printing AR-Variant frames
 22 simultaneously.

23 31. On or about April 7, 2022, a Federal Firearms Licensee (FFL) database
 24 query was conducted on MEEKINS. The query confirmed that MEEKINS does not have,

1 nor did he ever have, a Federal Firearms License to engage in the business of dealing or
2 manufacturing firearms.

3 32. A person who manufactures and sells firearms is required to hold a federal
4 firearms license ("FFL") in accordance with 18 U.S.C. § 923(a). As an FFL, the licensee
5 is required to mark the firearms the FFL manufactures in accordance with 18 U.S.C.
6 § 923(i) and its implementing regulation at 27 C.F.R. § 478.92, which prescribes the
7 identifying markings (including serial number and manufacturer name) and the manner in
8 which each firearm is to be marked. Additionally, 18 U.S.C. § 923(g)(1)(A) and its
9 implementing regulation at 27 C.F.R. § 478.123 prescribe record keeping requirements to
10 require the licensee to record specified information regarding the firearms manufactured
11 and information to whom the firearms are transferred.

12 33. Upon transfer of a firearm to a person who does not hold an FFL, the
13 licensee transferring the firearm is required to execute a Firearms Transaction Record
14 (ATF Form 4473) and initiate a background check on the non-licensed individual in
15 accordance with 18 U.S.C. § 923(g)(1)(A) and 18 U.S.C. § 922(t) and their implementing
16 regulations at 27 C.F.R. §§ 478.124 and 478.102. In this particular case, firearms are being
17 sold by MEEKINS without a license, without filling out an ATF Form 4473, and without
18 conducting a background check to determine if the purchaser or transferee of the firearms
19 is prohibited by Federal or State law from receiving a firearm.

20 CONCLUSION

21 34. Based upon the information set forth in this application, your Complainant
22 respectfully submits that there is probable cause to believe that CLARENCE MEEKINS
23 committed the offenses of *Engaging in the Business of Dealing or Manufacturing Firearms*
24

1 *Without a License*, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D), and
2 *Transfer or Possession of Machinegun*, in violation of 18 U.S.C 922(o).

3 Respectfully Submitted,

4 *James Gustaw*

5 Special Agent James Gustaw
6 Bureau of Alcohol, Tobacco, Firearms
and Explosives

7 Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
8 telephone on this 29th day of April, 2022.

9 
10 HONORABLE DANIEL J. ALBREGTS
11 UNITED STATES MAGISTRATE JUDGE

